

JF Mary Jo  
 Inspection Date 01/07/2005  
 Time Start 1025  
 Time Finish 1300  
 NTPS INSP ID # 1407361

☐ GENERATOR      ☒ S Q GENERATOR

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ORIGINAL : PA DEP REGION II (NERO) - WM - NORTHAMPTON CO. - MICHELMAN-CANCELLIERE IRON WORKS - INSPECTION  
PA DEP BETHLEHEM D.O. - " - " - " - " - " - "  
PA DEP CENTRAL OFFICE - WM - NORTHAMPTON CO. - MICHELMAN-CANCELLIERE IRON WORKS - INSPECTION  
US EPA REGION III  
FACILITY ✓ Page 1 of 5

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Michigan-Chexelide Tex ID Number PA0000510917 Date 01/07/2005  
WSD, Inc.  
 1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1				Identification Number	262a.10	262.12	H002
1				Authorized transporters only	262a.10	262.12(c)	H003
1				Subsequent notification requirements met	262a.12(b)		H004
1				Proper manifest used	262a.10	262.21	H005
1				Manifests filled out correctly and completely	262a.20		H006
1				Manifests signed and routed properly	262a.23(a)	262.23	H007
1				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
1				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
1				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	2			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1				Specified records retained for three years	262a.10	262.40(c)	H014
		3		Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	2			Exception reporting procedures followed	262a.42	262.42	H016
	2			Spill reporting procedures followed	262a.10	262.34(d)	H017
		3		PPC plan developed and implemented	262a.10	262.34(a)	H018
	2			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		3		Source reduction strategy prepared and available (LQG only)	262a.100		H020
	2			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name MICHELLEAN CANCELLERE TRON WORKS, INC. ID Number PAR000514917 Date 01/07/2005  
1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
1				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
1				Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
1				Containers managed to prevent leaks	265a.1	265.173(b)	H029
1				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		3		Container storage areas inspected at least weekly	265a.1	265.174	H031 *
1				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		3		Proper containment and collection systems in place	265a.179		H033 *
1				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
1				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
1				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

*Michelman-CANCELIERE TRON*  
*WEEKS INC.*  
*PAR000510917*  
*01/05/2005*

Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable				3-Not Determined				4-Non-Compliance			
Status				REQUIREMENT								Citation			
1	2	3	4									40 CFR Part 268			
1				Generators											
1				Notification sent with shipments of wastes that do not meet treatment standards.								7(a)(1)			
1				Notification and certification sent with shipments of wastes meeting treatment standards.								7(a)(2)			
1				Dilution not used as a substitute for treatment.								3			
1				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.								7(a)(5), (a)(6)			
	2			Storage Facilities											
	1			Facility verifies generators classification of waste in accordance with waste analysis plan.								25 Pa Code 265.13(c)			
				Containers marked to identify contents and accumulation date.								50(a)(2)			
				Notification sent with shipments of wastes that do not meet treatment standards.								7(a)(1)			
				Notification and certification sent with shipments of wastes meeting treatment standards.								7(a)(2)			
				Facility maintains records of documents produced pursuant to LDR requirements.								7(a)(6)			
				Treatment Facilities, including PBR and RRR Facilities											
				Dilution not used as a substitute for treatment.								3			
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.								7(b)			
				Certification and/or notification sent with shipments of waste.								7(b)(4), (b)(5), (b)(6)			
				Land Disposal Facilities											
				Facility tests wastes received to assure compliance with applicable treatment standards.								7(c)(2)			
				Facility land disposes of restricted waste only if it meets applicable treatment standard.								40			
	2			Facility retains copies of generator notifications and certifications.								7(c)(1)			

COMMONWEALTH OF PENNSYLVANIA  
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## INSPECTION REPORT COMMENTS

Date of Inspection

JANUARY 7, 2005

Identification Number

PAR000510917

Company/Facility/Site Name

MICHELMAN-CANCELLIERE IRON WORKS, INC.

I CONDUCTED AN INSPECTION OF THE FACILITY WITH MR. JOHN CANCELLIERE OF THE FACILITY. THE FACILITY IS A SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE AND GENERATES WASTE PAINT-RELATED MATERIAL FROM THE ONSITE STRUCTURAL STEEL OPERATION.

THE FACILITY WAS PREVIOUSLY OCCUPIED BY BETHELEHEM CONTRACTING, WITH WHOM MICHELMAN-CANCELLIERE MERGED IN 2002. THE FACILITY SUBMITTED A NOTIFICATION OF HAZARDOUS WASTE ACTIVITY AS A SMALL QUANTITY GENERATOR ON 06/22/2004. THE SITE HAD NOW UTILIZES EPA ID # PAR000510917, THOUGH IT HAD PREVIOUSLY USED ID # PADEP0010625 PER A REVIEW OF THE WASTE MANIFESTS. FURTHERMORE, THE SITE HAD PREVIOUSLY BEEN CLASSIFYING ITS RESIDUAL WASTES OF BAGHOUSE DUST, PLASMA CUTTING WASTE AND SANDBLAST AS HAZARDOUS WASTES.

THE SITE HAS BEEN INFORMED THAT THIS MIS-CLASSIFICATION WAS NOTED DURING A REVIEW OF THE HAZARDOUS WASTE MANIFESTS AT THE DEP'S CENTRAL OFFICE IN HARRISBURG. THE SITE SHALL NOTIFY THE DEP CENTRAL OFFICE OF THIS ERROR AND DETERMINE IF A HAZARDOUS WASTE BIENNIAL REPORT WILL BE REQUIRED FOR THE 2009 REPORTING YEAR.

THE SITE WAS PROVIDED WITH COPIES OF THE DEP HAZARDOUS AND RESIDUAL WASTE REGULATIONS, PRC PLAN GUIDELINES, & HAZARDOUS WASTE GENERATOR COMPLIANCE GUIDE. THE FACILITY WAS ALSO REMINDED OF THE REGULATIONS CONCERNING HAZARDOUS WASTE LABELING, SECONDARY CONTAINMENT, INSPECTION FREQUENCY AND PRC REQUIREMENTS.

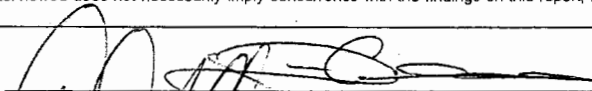
THIS CONCLUDES THE INSPECTION COMMENTS.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

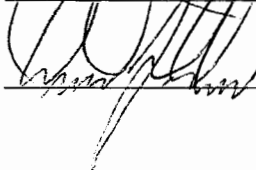


(Signature)

Date

1.7.05

Inspector



DAVID J. ELM

(Signature)

Date

01/07/2005

